

IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF DELAWARE

KERRY JOHNSON and	)	
SHARON ANDERSON,	)	
on behalf of themselves and all	)	
others similarly situated,	)	
	)	
Plaintiffs,	)	C.A. No. 1:06-cv408 (JJF)
	)	
	)	
v.	)	
	)	
GOVERNMENT EMPLOYEES	)	NON-ARBITRATION
INSURANCE COMPANY,	)	
GEICO CASUALTY COMPANY,	)	TRIAL-BY JURY DEMANDED
GEICO GENERAL INSURANCE	)	
COMPANY, and GEICO INDEMNITY	)	
COMPANY,	)	CLASS ACTION
	)	
Defendants.	)	

**RE-NOTICE OF 30(B)(6) DEPOSITION<sup>1</sup>**

TO: <b><u>BY HAND DELIVERY</u></b>	<b><u>BY FIRST CLASS MAIL</u></b>
Dawn L. Becker, Esquire	George M. Church, Esquire
Gary Alderson, Esquire	Laura A. Cellucci, Esquire
LAW OFFICES OF DAWN L. BECKER	MILES & STOCKBRIDGE P.C.
Citizens Bank Center	10 Light Street
919 Market Street, Suite 725	Baltimore, MD 21202
Wilmington, DE 19801	

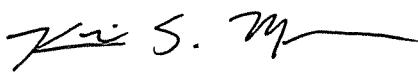
**PLEASE TAKE NOTICE** that pursuant to District Court Rule 30(b)(6), the Plaintiffs will continue the deposition upon oral examination of the person designated by Defendants with respect to the topics set forth in Exhibit A. The deposition will take place on March 26, 2008, commencing at 10:00 a.m. at the offices of Miles & Stockbridge P.C. 10 Light Street, Baltimore, Maryland, or such other date or at such other time or place as may be agreed upon by the parties or ordered by the Court. The deposition will be recorded by stenographic means.

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<sup>1</sup> This is a continuation of the 30(b)(6) deposition previously begun on January 29, 2008.

Dated: March 17, 2008  
Wilmington, Delaware

CROSS & SIMON, LLC

By: 

Richard H. Cross, Jr. (No. 3576)  
Christopher P. Simon (No. 3697)  
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*Attorneys for Plaintiffs*

**EXHIBIT A**

- Categories of information available on any and all databases kept by Defendants or their agents regarding PIP claims (i.e., claims submitted by insureds in accordance with 21 Del. C. §2118B) (the “Databases”)
- Format(s) in which Databases are maintained (SQL, XML, . . .)
- Size of each Database
- Present ability to query and/or organize the Databases (i.e., what programs or processes are in place and how information can be retrieved, such as Boolean searches, sorting, . . .)
- Other information concerning PIP claims that is available in an electronic format
- Information only available through paper files
- Where and how paper files are organized and stored
- How Defendants determined that in a five year period they had paid \$19,762,596 to a total of 4,279 Delaware claimants